Mr. James Roark
Rieter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356

Re: AA 089-11497-00013
First Administrative Amendment to
Part 70 No.: 089-6629-00013

Dear Mr. Roark:

Rieter Automotive North America, Inc. was issued a Part 70 permit T089-6629-00013 on June 16, 1999 for a stationary automotive sound deadening products manufacturing plant. A letter requesting a replacement of the burner for the Thermal Incinerator on Line 92 from 17.85 million British Thermal Units per hour (mmBtu/hr) to 15 mmBtu/hr was received on October 27, 1999. The new burner will reduce the emissions on NOx, CO, PM, and PM10 while allowing the unit to more efficiently and effectively control the process effluent. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (changes are bolded and deletions are struck through for emphasis):

In Section A.2 Emission Units and Pollution Control Equipment Summary, Item (8)(M) on Page 8
of 53 of the issued Part 70 permit is revised to reflect the new capacity of the thermal incinerator's burner as follows:

(8)

(M) One (1) ~~17.85~~ **15** million British Thermal Units per hour natural gas-fired incinerator;

The new burner capacity will also be reflected in Condition D.5 Facility Description Table on Page 41 of 53; Conditions D.5.9 and D.5.10 on Page 43 of 53 of the issued Part 70 permit.

This Amendment reiterates that condition D.5.9 of the issued Title V still applies, which requires Line 92 Thermal Oxidizer to operate at a minimum operating temperature of 1,400 °F, or the temperature determined in the most recent compliance stack tests.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
APD

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels/Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Rieter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-6629-00013	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 16, 1999
1st Minor Source Modification No.: 089-10909-00013	
Issued by: Paul Dubenetzky, Chief Permit Branch	Issuance Date: August 16, 1999
1st Administrative Amendment No.: AA089-11497-00013	Pages Affected: 8, 41, 43 and 44
Issued by: Paul Dubenetzky, Chief Permit Branch	Issuance Date:

hour,

(B) One (1) vacuum receiver, capacity 108 pounds per hour,

(C) Ten (10) storage silos with combined capacity of 53,914 pounds per hour,

(D) Two (2) reverse roll coaters, with maximum capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each,

(E) One (1) 6.00 million British thermal units per hour (mmBtu/hr) natural gas fired Line 8 oil heater, installed in 1991, identified as FCU-12.

(8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:

(A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,

(B) One (1) fiberglass opener,

(C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,

(D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,

(E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,

(F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,

(G) One (1) feed hopper,

(H) One (1) air lay,

(I) One (1) reclaim screen,

(J) One (1) classifier,

(K) One (1) picker,

(L) One (1) resin distributor,

(M) One (1) 15 million British thermal units per hour natural gas fired incinerator,

(N) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and

(O) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.

(9) One (1) liquid organic storage tank area, identified as VOLS, with a maximum capacity of 227,200 gallons of organic liquid, consisting of the following equipment:

(A) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Flux), storing asphalt, with capacity of 30,000 gallons;

(B) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Coating), storing asphalt, with capacity of 30,000 gallons;

(C) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 B-25, storing asphalt, with capacity of 30,000 gallons;

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:
- (A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,
- (B) One (1) fiberglass opener,
- (C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,
- (D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,
- (E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,
- (F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,
- (G) One (1) feed hopper,
- (H) One (1) air lay,
- (I) One (1) reclaim screen,
- (J) One (1) classifier,
- (K) One (1) picker,
- (L) One (1) resin distributor
- (M) One (1) 15 million British thermal units per hour natural gas fired incinerator,
- (N) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and
- (O) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.

(10) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:
- (A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using a low NOx burner as control, exhausting to one (1) stack (FCU-2(new)).
- (B) Four (4) bale breakers;
- (C) One (1) feed hopper.
- (D) One (1) fiber opener,
- (E) One (1) airlay,
- (F) One (1) classifier,
- (G) One (1) reclaim screen,
- (H) One (1) picker,
- (I) One (1) resin distributor, and
- (J) Two (2) aspirator tables.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) [326 IAC 8-7]

(a) The input of Volatile Organic Compound (VOC) to the Line 92 and the usage of cleanup solvent for the Line 92 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited such that the Volatile Organic Compound (VOC) emissions from the Line 92 and Line 92 NAVA Oven shall not exceed forty-three (43) tons per year when using the thermal oxidizer with 81% overall control efficiency or the overall control efficiency determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT. This input VOC limitation shall be based on the following equation:

$$VOC_{input} = VOC_{limit} / [1 - (\text{Capture Efficiency})(\text{Destruction Efficiency})]$$

(b) The input of Volatile Organic Compound (VOC) to the Line 91 and the usage of cleanup solvent for the Line 91 (the usage of cleanup solvent may need to take into account any

supplied by the coating or resin manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 or other IDEM, OAM approved method in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.7 VOC Emissions

Compliance with Condition D.5.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent 12 consecutive month period.

D.5.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the three (3) baghouses for PM control on Line 91 and three (3) baghouses on Line 92 shall be in operation at all times when the Lines are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.9 Thermal Incinerator [326 IAC 8-7]

(a) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the Line 91 conventional oven shall be in operation at all times when the Line 91 conventional oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, or a temperature determined in the compliance test to maintain an 81% minimum overall control efficiency or as determined in the stack test of potential Volatile Organic Compound (VOC) emissions. The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.

(b) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the NAVA oven shall be in operation at all times when NAVA oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, or a temperature determined in the compliance tests to maintain a minimum 81% overall control efficiency or as determined in the stack test of potential Volatile Organic Compound (VOC) emissions. The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.10 Record Keeping Requirements

(a) To document compliance with Condition D.5.9, the Permittee shall keep records of thermal incinerator temperatures from the 15 million British thermal units per hour (mmBtu/hr) Line 91 natural gas fired incinerator and the15 million British thermal units per hour natural gas fired Line 92 Incinerator.

(b) To document compliance with Condition D.5.1, the Permittee shall keep monthly records of input volatile organic compound (VOC) for the Line 92 NAVA oven and the Line 91 conventional oven.

(c) Pursuant to 40 CFR 60.48c, the permittee shall submit notification of the date of construction, anticipated startup, and actual startup, as provided by § 60.7 of this part for the one (1) 11.2 million British thermal units per hour natural gas fired boiler in Line 92. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under § 60.42c, or § 60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.11 Reporting Requirements

(a) An annual certification for the 11.2 million British thermal units per hour natural gas fired Line 92 boiler shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.

(b) A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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Paul Dubenetzky, Chief
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Air Compliance Section Inspector - Rick Massoels/Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner